

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case No: 1:19-cv-04715-NRB

LINDSEY ADELMAN STUDIO, LLC, a  
New York limited liability company, LINDSEY  
ADELMAN, individually,

Plaintiff,

vs.

ZORA Lighting Co., Ltd., a Chinese  
business entity; Liang Tang, individually,  
and John Does Nos. 1 - 5,

Defendants. /

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**DECLARATION OF REBECCA SATTERLEE**

Rebecca Satterlee, formerly Rebecca Brittain, does hereby declare pursuant to 28  
U.S.C. § 1746:

- I submit this declaration in support of Plaintiffs' Ex-Parte Motion for Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Issue (the "Motion"). This Declaration is based upon my personal knowledge.
- I am over the age of 21, am a resident of the state of New York, have personal and first-hand knowledge of the facts set forth in this Declaration, and I am competent to testify to those facts if called as a witness.
- I founded Bec Brittain in 2009, and officially formed Bec Brittain, LLC in 2012. Since founding Bec Brittain, I have had first-hand knowledge and input for

every significant decision made by the company.

- Bec Brittain designs, develops, and creates a variety of home-décor and lighting design products. All of the Bec Brittain designs are made in New York using a variety of techniques and a network of local fabricators and artisans. Every piece is assembled by hand in the company studio in Manhattan under my supervision.

- My work has been featured in The New York Times, Architectural Digest, Elle Décor, Case da Abitare, and Wallpaper magazines, among many others. My limited edition designs have been shown at Patrick Parrish Gallery, and my work was featured in a 2018 exhibition organized by 1stdibs' in Milan during the Salone del Mobile.

- Some of my clients include today's top architects and interior designers and my work appears in commercial and residential projects around the world.

- I have deliberately chosen to keep the company small and sell Bec Brittain lighting pieces directly as well as through a small group of carefully curated high end stores.

- In addition to other intellectual property, Bec Brittain, LLC is the owner of the BEC BRITAIN trademark in connection with lighting fixtures, chandeliers, desk, floor, and table lamps, sconce lighting fixtures, and LED lighting fixtures.

- I am familiar with the [www.zoralighting.com](http://www.zoralighting.com) website as well as its presence on social media.

- On its website and social media, the company sells and solicits to sell counterfeit and unauthorized Bec Brittain products.

- Neither the [www.zoralighting.com](http://www.zoralighting.com) website, nor those who own and operate it have, or have ever had the right or authority to sell Bec Brittain products, utilize its trademarks, or sell Bec Brittain goods.

- Despite their lack of authority, [www.zoralighting.com](http://www.zoralighting.com) has been advertising, offering for sale, and/or selling, identical or substantially similar copies of Bec Brittain lighting products bearing counterfeit and infringing trademarks.

- Zora's website home page links to a dedicated "Bec Brittain" store within the [www.zoralighting.com](http://www.zoralighting.com) site, found at <https://www.zoralighting.com/Bec-Brittain> ("Zora's Bec Brittain page").

- Zora's Bec Brittain page contains a copy of an authentic photo of me as well as photos of Bec Brittain products which were taken from my website without authorization.

- As a consequence, when Zora's Bec Brittain page appears, it shows images of authentic Bec Brittain designs and photographs for sale by Zora at a fraction of the price consumers pay for authentic Bec Brittain lighting designs.

- Zora is not an authorized re-seller of Bec Brittain products, has no relationship with Bec Brittain, and does not otherwise deal in authentic Bec Brittain goods.

- Analysis of Zora's website reveals that Zora offers for sale dozens of copies of products purportedly originating from Bec Brittain while utilizing authentic images commissioned and published by Bec Brittain along with its trademark.

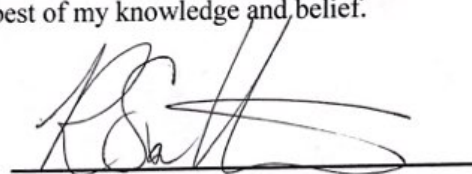
- In addition to confusing its customers by duping them into believing that

they are purchasing an authentic Bec Brittain product, Zora's business efforts dilute the goodwill built by Bec Brittain as well as the financial success of the company.

- As a consequence, Bec Brittain supports Lindsey Adelman and Lindsey Adelman Studio's effort to take down the [www.zoralighting.com](http://www.zoralighting.com) website for the reasons set forth above.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 28, 2019

A handwritten signature in black ink, appearing to read 'RS', is written over a horizontal line.

Rebecca Satterlee